REMARKS/ARGUMENTS

This Amendment is being filed in response to the Final Office Action dated April 16, 2008. Reconsideration and allowance of the application in view of the amendments made above and the remarks to follow are respectfully requested.

Claims 1-17 are pending in this application.

By means of the present amendment, claims 1-17 are amended including for better conformance to U.S. practice, for example by changing "characterized in that" to --wherein--, amending dependent claims to begin with "The" and changing spelling from British to American spelling. By these amendments, claims 1-17 are not amended to address issues of patentability and Applicants respectfully reserve all rights under the Doctrine of Equivalents. Applicants furthermore reserve the right to reintroduce subject matter deleted herein at a later time during the prosecution of this application or continuing applications.

In the Office Action, claims 1, 2, 4, 5, and 6-10 are rejected under 35 U.S.C. §102(e) as allegedly anticipated by U.S. Patent No. 6,344,837 to Gelsey ("Gelsey"). Claims 3 and 11-15 are rejected

under 35 U.S.C. §103(a) as allegedly unpatentable over Gelsey in view of U.S. Patent No. 6,154,855 to Norman ("Norman"). These rejections are respectfully traversed. It is respectfully submitted that claims 1-17 are allowable over Gelsey alone and in view of Norman for at least the following reasons.

It seems undisputed that Gelsey shows a centralized computer 54 (see, FIG. 13) that calculates the contribution of each 3-D pixel (see, Final Office Action, page 12, Response to Arguments section, numbered paragraph 1. Further, each of FIGs. 14 and 15 noted on page 13 of the Final Office Action, relate to flowcharts for programming the central computer (see, Col. 3, lines 11-20). The Final Office Action has interpreted the term "determining at each of the 3-D pixels a contribution of light" of the claims as allowing for a calculation of the contribution elsewhere. Applicants respectfully disagree with and explicitly traverse this interpretation of the claim language.

While the claims do not exclude some calculation being performed at other than the 3-D pixel, the claims did recite that the 3-D pixel determines a contribution of light. Gelsey in

contrast to the claims shows a master/slave relationship wherein a centralized computer makes such a determination which is then transferred to the 3-D pixels. A person of ordinary skill in the art would not understand a slave type device as "determining its contribution" merely because the slave type device must respond to the instruction of the master. However, in the interest of expediting consideration and allowance of the present patent application, the Applicants have elected to change the term "determining" and formatives thereof to the term "calculating" and formatives thereof to avoid the interpretation provided in the Office Action that is incongruent with the understanding of the term by a person of ordinary skill in the art. It is respectfully submitted that this amendment is not provided for the purposes of patentability and that no new matter is provided by this amendment in that prior to the amendment submitted on January 11, 2008, the claims contained the term (emphasis added) "3-D pixel <u>calculates its contribution</u>..." Applicants accordingly respectfully reserve all rights under the Doctrine of Equivalents. Applicants furthermore reserve the right to reintroduce subject matter deleted

herein at a later time during the prosecution of this application or continuing applications.

It is respectfully submitted that the method of Claim 1 is not anticipated or made obvious by the teachings of Gelsey alone and in view of Norman. For example, Gelsey alone and in view of Norman does not disclose or suggest, a method that amongst other patentable elements, comprises (illustrative emphasis provided) "calculating at each of the 3-D pixels a contribution of light from the 3-D pixel to generate at least in part a scene point of the plurality of 3-D scene points; and performing at least one of emitting and transmitting the light by each of the 3-D pixels that is calculated to contribute to the scene point" as recited in claim 1, and as substantially recited in claim 11.

Gelsey performs the 3-D calculation at a central processor and transfers the data to the 3-D pixels for rendering a scene. Norman is cited for allegedly showing another element of the claims and as such, does nothing to cure the deficiencies in Gelsey.
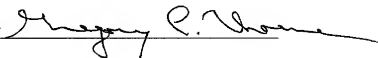
Based on the foregoing, the Applicants respectfully submit that independent claims 1 and 11 are patentable over Gelsey alone

and in view of Norman and notice to this effect is earnestly solicited. Claims 2-10 and 12-17 respectively depend from one of claims 1 and 11 and accordingly are allowable for at least this reason as well as for the separately patentable elements contained in each of said claims. Accordingly, separate consideration of each of the dependent claims is respectfully requested.

In addition, Applicants deny any statement, position or averment of the Examiner that is not specifically addressed by the foregoing argument and response. Any rejections and/or points of argument not addressed would appear to be moot in view of the presented remarks. However, the Applicants reserve the right to submit further arguments in support of the above stated position, should that become necessary. No arguments are waived and none of the Examiner's statements are conceded.

Applicants have made a diligent and sincere effort to place this application in condition for immediate allowance and notice to this effect is earnestly solicited.

Respectfully submitted,

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